

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ANGIOSCORE, INC.,

Plaintiff,

V.

TRIREME MEDICAL, INC., EITAN KONSTANTINO, and QUATTRO VASCULAR PTE LTD..

Defendants.

Case No. 4:12-cv-3393-YGR

**[PROPOSED] MODIFIED ORDER RE
PLAINTIFF ANGIOSCORE, INC.'S
MOTION TO COMPEL PRODUCTION
OF UNREDACTED DOCUMENTS**

The Hon. Yvonne Gonzalez Rogers

AND RELATED COUNTER-CLAIMS.

1 Pursuant to the parties' jointly submitted letter brief regarding the issues in
2 dispute concerning Defendant TriReme Medical, Inc.'s ("TriReme") redacted
3 production of documents in response to Plaintiff AngioScore, Inc.'s ("AngioScore")
4 Request for Production of Documents No. 39, and for the reasons set forth at the
5 telephonic hearing on the motion, the Court hereby **GRANTS** Plaintiff
6 AngioScore's Motion to Compel Production of Unredacted Documents (Dkt. No.
7 73), subject to the restrictions below.

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IT IS THEREFORE ORDERED:

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11 (1) That Defendant TriReme shall produce to AngioScore's outside
12 counsel unredacted copies of all redacted documents previously produced in
13 response to Request for Production of Documents No. 39 on or before Friday,
14 August 2, 2013;

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16 (2) That all such unredacted documents produced by TriReme shall be
17 treated as "Confidential-Attorneys' Eyes Only" by outside counsel for AngioScore
18 and shall not be disclosed to AngioScore;

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20 (3) That counsel for AngioScore, shall not directly contact, or arrange for
21 any contact, of any of Defendant TriReme's customers¹ [disclosed in discovery](#),
22 except as authorized by the Court; and

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26 ¹ "Customers" as herein defined shall mean any individual or entity that has used or
27 purchased a Chocolate PTA Balloon Catheter in the United States directly from Defendant
28 TriReme between January 1, 2010 to the present.

1 (4) If counsel for AngioScore believes it has good cause to contact, or
2 arrange for any contact, of any customer identified by TriReme in **discovery**, the
3 parties shall meet and confer to come to an agreement relating to the protocol
4 governing customer contact. Should the parties be unable to agree on an appropriate
5 protocol, AngioScore may file a request for discovery relief pursuant to Sec. 8(b) of
6 this Court's Standing Order in Civil Cases, dated Nov. 15, 2012.

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8 While the Court declines to issue an order with respect to matters not
9 currently before it, the parties should consider this order in SOMETHING future
10 issues. The parties are advised that requiring further Court intervention as a result
11 of unreasonable discovery positions may result in sanctions.

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13 This Order Terminates Docket Number 73.

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15 **IT IS SO ORDERED.**

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18 Date: July 25, 2013



The Honorable Yvonne Gonzalez Rogers
United States District Court Judge

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